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AO 91 (Rev. 11/11) Criminal Complaint

Inspector:

Christopher Bradshaw

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UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Dennis James SWINT

Case: 2:24-mj-30237

Assigned To : Unassigned

Assign. Date : 6/21/2024

Case No.

Description: RE: DENNIS JAMES
SWINT (EOB)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 17, 2023 - June 21, 2023 in the county of Oakland, Genesee, Washt. in the
Eastern District of Michigan, the defendant(s) violated:*Code Section**Offense Description*

18 U.S.C. § 1028A(a)(1)

Aggravated Identity Theft

18 U.S.C. § 1344

Bank Fraud

18 U.S.C. § 1546

Fraud and Misuse of U.S. Passport Card

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.Sworn to before me and signed in my presence
and/or by reliable electronic means.Date: June 21, 2024City and state: Detroit, MI*Complainant's signature*Christopher Bradshaw, Postal Inspector*Printed name and title**Judge's signature*David R. Grand, United States Magistrate Judge*Printed name and title*

AFFIDAVIT

I, Postal Inspector Christopher G. Bradshaw, being first duly sworn, hereby depose and state as follows:

1. I am a United States Postal Inspector assigned to the Detroit Division of the U.S. Postal Inspection Service (USPIS) Financial Crimes Team. I have been a Postal Inspector since June 2013 where I attended the United States Postal Inspection Service Basic Training Academy. I am sworn and empowered to investigate criminal activity involving or relating to the U.S. Postal Service. As a Postal Inspector, I have conducted or participated in numerous investigations involving violations of federal and state law, including cases related to revenue fraud, theft of mail, mail fraud, account takeover fraud, identity theft, robberies, and burglaries. In my capacity as a Postal Inspector, I also have training in executing residential and vehicular search warrants to seize computers, phones and other electronic devices, narcotics, mail, and firearms. I am also a member, and Certified Financial Crimes Investigator (CFCI), of the International Association of Financial Crime Investigators. Previously, I was assigned to investigate the unlawful transportation of contraband, including Title 21 controlled substances, through the United States Mail.

2. The facts contained in this affidavit come from my personal observations, my training and experience, my review of documents and statements

and/or information obtained from other law enforcement officers, victims, witnesses and individuals with knowledge of this matter. This affidavit is intended to establish probable cause for the requested criminal complaint and arrest warrant and does not set forth all facts known to law enforcement related to this investigation.

3. This affidavit is being submitted for the purpose of obtaining a criminal complaint and arrest warrant charging Dennis SWINT with violations of 18 U.S.C. § 1028A(a)(1) (Aggravated Identity Theft), 18 U.S.C. § 1344 (Bank Fraud), and 18 U.S.C. § 1546 (Fraud and Misuse of Visas, Permits, and Other Documents).

PROBABLE CAUSE

4. The United States Department of State issues passport cards to United States citizens. Passport cards are similar in size to a driver's license and can lawfully be used to enter land border crossings and seaports-of-entry from Canada, Mexico, Caribbean countries, and Bermuda. Passport cards can also lawfully be used as alternatives to state-issued identification. Passport cards contain similar information as a passport book, such as the citizen's photograph, name, sex, date of birth, place of birth, a passport number, the issuance date, the expiration date, as well as various security features. I know from my training and experience that fraudulent passport cards are often used by individuals engaged in fraud and theft offenses because passport cards are not commonly used as a form of identification, and therefore,

employees at banks or businesses are less likely to spot counterfeit or forged passport cards.

5. Michigan Schools & Government Credit Union (MSGCU) is a federally insured financial institution with branches in the Eastern District of Michigan. On May 17, 2023, a man entered a branch of MSGCU in Livonia, Michigan and made a cash withdrawal from VICTIM 1's bank account for \$3,800. The man made the withdrawal representing himself as VICTIM 1 and using a United States passport card with the man's picture but the identifying information of VICTIM 1. After making the withdrawal, the man took the money and left the branch on foot. VICTIM 1 informed local police officers that he had not authorized or made the cash withdrawal.

6. Video surveillance from the MSGCU branch in Livonia, Michigan on May 17, 2023, shows that the individual who made the withdrawal was a middle-aged white male of slim build with a gray beard, wearing a red polo shirt, khaki pants, and a red, white, and blue baseball cap with a Chevrolet car logo printed on the front of the hat. The man who made the withdrawal is not the same individual as VICTIM 1. Images from the branch's security system were provided to local police to identify the suspect. A digital image search conducted by the Michigan State Police (MSP) returned Dennis SWINT (DOB XX/XX/1967) as the person of interest. I have also compared images of the man in the surveillance video to booking

and other photographs of Dennis SWINT. Based on this comparison, I recognize the man in the video surveillance who made the withdrawal at the MSGCU branch in Livonia, Michigan on May 17, 2023, to be Dennis SWINT.

7. Credit Union One is a federally insured financial institution with branches in the Eastern District of Michigan. On June 7, 2023, a man entered a branch of Credit Union One in Troy, Michigan and made two cash withdrawals from VICTIM 2's bank account: a \$4,000 withdrawal from VICTIM 2's checking account and a \$4,000 withdrawal from VICTIM 2's savings account. The man made the two withdrawals representing himself as VICTIM 2 and using a United States passport card with the man's picture but the identifying information of VICTIM 2. After making the withdrawals, the man took the money and left the branch. VICTIM 2 informed local police that he had not authorized or made the withdrawals. VICTIM 2 also stated that he has a United States passport card, but it is invalid.

8. Video surveillance from the Credit Union One branch in Troy, Michigan on June 7, 2023, shows that the individual who made the withdrawals is not the same person as VICTIM 2. The video surveillance shows a middle-aged white male of slim build wearing eyeglasses, a dark polo shirt, khaki pants, and black shoes with white soles. The video surveillance also shows that the man who made the withdrawals is the same person who made the fraudulent cash withdrawal at the MSGCU branch in Livonia, Michigan on May 17, 2023. The man even appears to

be wearing the same red, white, and blue baseball cap with the Chevrolet car logo printed on the front of the hat as he wore on May 17, 2023. I recognize the man in the surveillance video who made the withdrawals at the Credit Union One branch in Troy, Michigan on June 7, 2023, to be Dennis SWINT.

9. Financial Plus Credit Union is a federally insured financial institution with branches in the Eastern District of Michigan. On June 15, 2023, a man entered a branch of Financial Plus Credit Union in Fenton, Michigan, claimed to be an VICTIM 3, and made two cash withdrawals from a joint bank account owned by VICTIM 3 and his wife. One withdrawal was for \$5,900 and the other withdrawal was for \$5,200. The man made the two withdrawals representing himself as VICTIM 3 and using a United States passport card with the man's picture but the identifying information of VICTIM 3. After making the withdrawals, the man took the money and left the branch.

10. Video surveillance from the Financial Plus Credit Union branch in Fenton, Michigan on June 15, 2023, shows that the man who made the withdrawals is not the same individual as VICTIM 3. The video surveillance shows a middle-aged man of slim build with a gray beard, wearing a black polo shirt, dark jeans, and black shoes with white soles. The video surveillance also shows that the man who made the withdrawals is the same person who made the fraudulent withdrawals at the MSGCU branch in Livonia, Michigan on May 17, 2023, and at the Credit Union

One branch in Troy, Michigan on June 7, 2023. The man even wore the same red, white, and blue baseball cap with the Chevrolet car logo printed on the front of the hat as he wore in the two prior incidents. I recognize the man in the surveillance video who made the withdrawals at the Financial Plus Credit Union in Fenton, Michigan on June 15, 2023, to be Dennis SWINT.

11. Lake Trust Credit Union is a federally insured financial institution with branches in the Eastern District of Michigan. On June 21, 2023, a man entered a branch of Lake Trust Credit Union in Chelsea, Michigan, and made two cash withdrawals from VICTIM 4's bank account. One withdrawal was for \$7,200 and the other withdrawal was for \$6,300. The man made the withdrawals representing himself as VICTIM 4 and using a United States passport card with the man's picture but the identifying information of VICTIM 4. After making the withdrawals, the man took the money and left the branch. Suspecting fraud, the branch contacted VICTIM 4, who stated that he did not visit the branch that day and was home sick.

12. Video surveillance from the Lake Trust Credit Union branch in Chelsea, Michigan on June 21, 2023, shows that the man who made the withdrawals is the same person who made the fraudulent withdrawals at the MSGCU branch in Livonia, Michigan on May 17, 2023; the Credit Union One branch in Troy, Michigan on June 7, 2023; and the Financial Plus Credit Union in Fenton, Michigan on June 15, 2023. The video surveillance shows a middle-aged man of slim build with a gray

beard, wearing eyeglasses, a blue polo shirt, khaki pants, and black shoes with white soles. The man appears to be wearing the same black shoes as he did on June 7, 2023, and June 15, 2023. I recognize the man in the surveillance video who made the cash withdrawals at the Lake Trust Credit Union in Chelsea, Michigan on June 21, 2023, to be Dennis SWINT.

CONCLUSION

13. Based upon the evidence detailed above, and my experience and training in investigating financial criminal activity, probable cause exists to believe that, in the Eastern District of Michigan, Dennis SWINT did commit violations of 18 U.S.C. § 1028A(a)(1) (Aggravated Identity Theft), 18 U.S.C. § 1344 (Bank Fraud), and 18 U.S.C. § 1546 (Fraud and Misuse of Visas, Permits, or Other Documents).



Christopher G. Bradshaw, Postal Inspector
U.S. Postal Inspection Service

Subscribed and sworn to before me in
my presence and/or by reliable electronic means.



HON. DAVID R. GRAND
U.S. MAGISTRATE JUDGE

June 21, 2024